



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP - 6 2007

Mr. Edward Putnam, Assistant Director  
Division of Hazardous Site Mitigation  
New Jersey Department of Environment Protection  
P.O. Box 028, 6<sup>th</sup> Floor  
401 East State Street  
Trenton, New Jersey 08625

Re: Explanation of Significant Differences for the L.E. Carpenter/Dayco Corporation  
Superfund Site

Dear Mr. Putnam:

Enclosed for your review and comment you will find the draft Explanation of Significant Differences (ESD) for the L.E. Carpenter/Dayco Corporation Site (L.E. Carpenter site or Site). The ESD documents the following changes to soil components of the remedy:

- floating product and associated smear zone soils were excavated and disposed of off-site as an alternative to the active removal system selected in the ROD due to the low yield floating product extraction system previously installed;
- bis (2-ethylhexyl) phthalate (DEHP) impacted soils were excavated and disposed of off-site instead of being consolidated into a soil treatment zone;
- no reinfiltration of treated groundwater will be performed for the purpose of treating soil contamination, as all contaminated site soils were excavated to meet the cleanup standards and disposed of off-site;
- following implementation of the source reduction remediation, all disturbed areas were restored to proposed final grades with vegetative cover;
- excavation and off-site disposal of soils containing PCBs and lead were completed to meet the more stringent New Jersey Residential Direct Contact Soil Cleanup Criteria (RDCSCC) (0.49 ppm and 400 ppm, respectively) instead of the Non-residential Direct Contact Soil Cleanup Criteria (2.0 ppm and 600 ppm, respectively) as required by the ROD;

281837



Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)